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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SHARON PEPOWSKI, an Individual,  
Plaintiff,  
vs.

99 CENTS ONLY STORES LLC, a  
Foreign Corporation, d/b/a 99 CENTS  
ONLY STORE #404, WINKLER  
PROPERTIES, LP, a Foreign Limited  
Partnership, ALBERTSON'S LLC, a  
Foreign Limited Liability Company, d/b/a  
ALBERTSON'S #93, SUPERIOR  
ELECTRICAL, MECHANICAL AND  
PLUMBING, INC., a Foreign  
Corporation, DOE EMPLOYEES I  
through X, and ROE BUSINESS  
ENTITIES I through X inclusive;

Defendants.

AND RELATED MATTERS.

Case No.: 2:21-cv-01990-ART-EJY

**STIPULATION AND ORDER TO**  
**EXTEND DEADLINE TO SUBMIT**  
**PRETRIAL ORDER**  
(Second Request)

Pursuant to LR IA 6-1 AND LR 26-3, the parties, by and through their respective counsel, respectfully submit this stipulation for extension of time to submit the Pre-Trial Order by a period of thirty (30) days. Counsel for the parties have conferred regarding this matter and agree that

such an extension is appropriate and necessary for litigation efficiency. **The parties herein request an extension of the deadline to submit the Pre-Trial Order by an additional thirty (30) days.**

**1. Discovery Completed to Date**

Discovery is now closed. The parties exchanged initial and supplemental disclosures. The parties propounded written discovery in the form of interrogatories, admissions, and requests for production of documents. The parties engaged in deposition discovery and exchanged initial and rebuttal expert disclosures.

**2. Discovery that Remains to be Completed**

None.

**3. Reasons Why Counsel Requests the Extension to Submit the Pre-Trial Order**

The Plaintiff and the Defendant Albertson's have reached a settlement. The remaining parties are the Plaintiff, SHARON PEPOWSKI, the Defendant, SUPERIOR ELECTRICAL, MECHANICAL AND PLUMBING, INC., and the Third-Party Defendant PREFERRED ELECTRIC, LLC. The case is currently scheduled for an in-person Settlement Conference with the U.S. Magistrate Judge Elayna J. Youchah on September 26, 2024, at 9:00 a.m. The parties are hopeful that the case can be resolved through the settlement conference process. The parties worked together to create a draft of the Joint Pre-Trial Order. However, they require additional time to meet and confer and to finalize the document. The parties have exchanged emails in drafting the Joint Pre-Trial Order. The parties believe that the additional thirty (30) day extension of the deadline for the Pre-Trial Order is necessary and appropriate based on the foregoing. The parties also believe good cause is demonstrated by the recited facts and in support of the extension of the instant deadline.

1                   **4.       Proposed Schedule for Completion of Outstanding Discovery**

2                   The parties respectfully propose the following deadlines:

3 <b><u>Event</u></b>	4 <b><u>Current Deadline</u></b>	5 <b><u><del>Proposed</del> Deadline</u></b>
6                   Last day to add parties or 7                   amend Pleadings	8                   --	9                   Closed
10                  Initial Expert Disclosures	11                  --	12                  Closed
13                  Rebuttal Expert Disclosures	14                  --	15                  Closed
16                  Close of Discovery	17                  --	18                  Closed
19                  Dispositive Motions Deadline	20                  --	21                  Closed
22                  Pre-Trial Order	23                  September 12, 2024	24                  October 14, 2024

25                  DATED this 11<sup>th</sup> day of September 2024.

26                  **LAW OFFICES OF KEVIN R HANSEN**

27                  /s/ Sean M. Hoeffgen, Esq.

28                  KEVIN R. HANSEN, ESQ.

29                  Nevada Bar No. 6336

30                  SEAN M. HOEFFGEN, ESQ.

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34                  Attorneys for Plaintiff Sharon Peplowski

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42                  DATED this 11<sup>th</sup> day of September 2024.

43                  **LUH & ASSOCIATES**

44                  

45                  CHARLIE LUH, ESQ.

46                  Nevada Bar No. 6726

47                  D. JASON FERRIS, ESQ.

48                  Nevada Bar No. 7698

49                  8987 W. Flamingo Road, Suite 100

50                  Las Vegas, NV 89147

51                  Attorneys for Defendant Superior Electrical,

52                  Mechanical & Plumbing, Inc.

1 DATED this 11<sup>th</sup> day of September 2024.

DATED this 11<sup>th</sup> day of September 2024.

2 **BACKUS, CARRANZA & BURDEN**

**WINNER & BOOZE**

3 /s/ Jack P. Burden, Esq.

/s/ Lara L. Miller Esq.

4 JACK P. BURDEN, ESQ.

LARA L. MILLER, ESQ.

5 Nevada Bar No. 6918

Nevada Bar No. 12618

6 JEREMY R. ROBINS, ESQ.

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7 Nevada Bar No. 11701

Las Vegas, NV 89102

8 3050 South Durango Drive

*Attorneys for Third-Party Defendant*

9 Las Vegas, Nevada 89117

*Preferred Electric, Inc.*

10 *Attorneys for Defendant Albertson's LLC*

11 **IT IS SO ORDERED** this 11th day of September, 2024.

12   
13 UNITED STATES MAGISTRATE JUDGE

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